



DALE E. BARNEY
Director

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July 7, 2020

VIA ECF

Hon. Vincent F. Papalia, USBJ
United States Bankruptcy Court
Martin Luther King, Jr. Federal Building
50 Walnut Street, 3d Floor
Newark, NJ 07102

RE: Immune Pharmaceuticals, Inc., Case No. 19-13273 (Jointly Administered)

Dear Judge Papalia:

We are counsel to Discover Growth Fund, LLC ("Discover") in the captioned chapter 11 cases. This letter shall serve as Discover's objection to the final fee applications of Lowenstein Sandler, LLP [Doc 502] and Gornitzky & Co. [Doc 518] and a supplement to the Supplemental Objection of Discover Growth Fund, LLC to Fee Applications of Chapter 11 Estate Professionals filed on May 26, 2020 [Doc 468] ("Supplemental Objection") and Discover's prior objection to the chapter 11 professionals' fee applications filed in these cases. This letter and the Supplemental Objection shall likewise apply to any other fee applications that may be filed by any of the chapter 11 professionals in these cases.

Since the filing of the Supplemental Objection, Lowenstein Sandler, LLP, as special counsel to the debtors, and Gornitzky & Co., as special Israel counsel to the creditors' committee. As discussed in the Supplemental Objection, Lowenstein Sandler, LLP seeks an award of \$134,082.50 in fees and \$6,031.10 in expenses. Gornitzky & Co. seeks an award of \$151,292.70 in fees and \$3,696.86 in expenses.

Discover objects to these fee applications for the reasons set forth in the Supplemental Objection, which are hereby incorporated by reference. I note that, like its interim fee application [Doc 381], Lowenstein Sandler, LLP's final fee application includes a proposed order directing payment within a specified number of days, which is objectionable for the reasons set forth in the Supplemental Objection. As such, Discover submits that these fee applications, like the others addressed in the Supplemental Objection, should be denied.

GIBBONS P.C.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Barney', with a stylized flourish at the end.

Dale E. Barney
Director

Enc.

Cc: All parties in interest (via ECF/Email)
Jonathan I. Rabinowitz, Esq.
Morris Bauer, Esq.
Jeffrey Prol, Esq.
John Mairo, Esq.
Yaron Elhawi, Esq.